



Proskauer Rose LLP Eleven Times Square New York, NY 10036-8299

April 18, 2024

By ECF

Honorable Analisa Torres, U.S.D.J.
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Elise M. Bloom
Member of the Firm
d +1.212.969.3410
f 212.969.2900
ebloom@proskauer.com
www.proskauer.com

Re: Doe v. Portnow, et al.; Civil Action No. 1:24-cv-00345 (AT)

Dear Judge Torres:

We represent Defendant National Academy of Recording Arts & Sciences, Inc. (the “Recording Academy”) in the above-referenced matter.

As you know, on April 11, 2024, Your Honor denied Plaintiff Doe’s motion to remand (Dkt. 27). Pursuant to Your Honor’s January 23, 2024 Order (Dkt. 11), the Recording Academy was required to respond to the Complaint or serve a pre-motion letter pursuant to Rule III.B of Your Honor’s Individual Practices in Civil Cases within seven (7) days of the decision on the remand motion – here, by April 18, 2024. Please be advised that today the Recording Academy served the first pre-motion letter required pursuant to Rule III.B upon counsel for Plaintiff Doe.

Respectfully submitted,

/s/ *Elise M. Bloom*

Elise M. Bloom

cc: All Counsel of Record (by ECF)